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August 23, 2016

Ms. Barcy McNeal  
Docketing Division Chief  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43215

Re: Confidential treatment of proprietary information filed in  
Case No. 13-1115-TP-COI and Case No. 14-1115-TP-COI  
regarding High Cost Universal Service filings

Dear Ms. McNeal:

The Ohio Telecom Association ("OTA") respectfully submits this letter in support of its Member Companies in the above-captioned proceedings and urges the Public Utilities Commission of Ohio ("Commission") to reconsider and reverse its August 19, 2016 Entries in denying confidential treatment to the information filed under seal in these proceedings. Additionally, OTA requests that the docketing division maintain the records under seal until the Commission addresses the entries.

On August 4, 2014, an attorney examiner, in Case No. 13-1115-TP-COI, granted motions for protective treatment from several OTA Member Companies, finding that the Commission was prohibited from disclosing trade secrets contained in those filings, but requested that three OTA Members (Frontier Communications, New Knoxville Telco, and Minford Telephone Company) hire Ohio counsel and file properly submitted motions for protective treatment of their respective confidential information. In response to this August 4, 2014 Entry, the aforementioned companies acquired Ohio counsel and filed motions for protective treatment of their business information. On June 16, 2016, the OTA Member Companies that had received a protective order on August 4, 2014, filed and sought an extension of their protective orders because the information was still deemed to be sensitive business information.

On August 19, 2016, an attorney examiner Entry was issued in this proceeding which granted the June 16, 2016 extension requests, but determined that the motions of Frontier Communications, New Knoxville Telco, and Minford Telephone Company were moot on the basis that no extensions of their original requests were filed by these entities.

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The OTA would respectfully request that this denial of confidential treatment be reconsidered by the Commission. Based on the attorney examiner's prior determination that the information filed under seal by these companies constitutes trade secrets and the recent finding that similar information filed by other companies in 2013 retains its status as trade secrets, the Entry's finding that the motions are moot does not appear to be reasonable. Additionally, Commission rules do not require a telephone company to seek an extension of its motion seeking a protective order.

In a separate Entry issued in Case No. 14-1115-TP-COI on August 19, 2016, an attorney examiner refused to grant motions seeking protective orders for the same reasons stated in the 2013 case. The OTA would respectfully request that this denial of confidential treatment in Case No. 14-1115-TP-COI be reversed by the Commission.

Based on the interest of its Members to encourage the development of competitive alternatives and a strong business environment for Ohio's telecommunications industry, OTA encourages the Commission to reconsider and reverse the recent Entries that directed the public disclosure of trade secrets of its members. To prevent an unwarranted disclosure of the information, OTA also requests that the Commission direct the docketing division to maintain the information under seal until the Commission addresses the entries.

Respectfully submitted,

*/s/ Scott E. Elisar*

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**ATTORNEY FOR THE OHIO TELECOM ASSOCIATION**

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Summary: Correspondence (Revised Correspondence) regarding the High Cost Universal Service Filings electronically filed by Scott E. Elisar on behalf of Ohio Telecom Association